Remarks:

Claims 1–33 were previously pending with claims 1, 6, 9, 14, 19, 24, and 29 being independent. Claims 1, 3, 14, 16-17, 24, and 26 are currently amended and claims 2, 5-13, 15, 18-23, 25, 27, and 29-33 are cancelled, therefore claims 1, 3-4, 14, 16-17, 24, 26, and 28 are currently pending with claims 1, 14, and 24 being independent.

Interview Summary

On August 26, 2008, Patent Agent Jaclyn S. Alcantara conducted a phone interview with Patent Examiner Cindy Nguyen. In this interview, Examiner Nguyen agreed that the proposed amendments to claims 1, 14, and 24 (as presented herein), do overcome the prior art. Therefore, claims 1, 14, and 24, as well as their dependent claims, are now in condition for allowance.

However, Examiner Nguyen maintained her assertion that the independent claims 6, 9, 19, and 29 were still anticipated by the prior art. The Applicant does not necessarily agree with this assertion. However, claims 6, 9, 19, and 29 and each of their dependent claims have been withdrawn in order to expedite a Notice of Allowance.

The Rejection of Claims under 35 USC 102

In the Office Action dated July 1, 2008 ("OA"), claims 1–3, 6, 9–11, 14-16, 19-21, 24-26, and 29-31 were rejected under 35 U.S.C. § 102(b) as being anticipated by Alan S. Gunderson "An SQL Interface for Common LISP", Digital Equipment Corporateion, copyright 1991 (hereafter Gunderson). Accordingly, claims 1, 14, and 24 are amended to incorporate elements of previously pending claims 2, 15, and 25 which are not present in Gunderson. Subsequently, claims 2, 15, and 25 are presently cancelled.

Specifically, Gunderson does not disclose "converting the SQL to an *intermediate tree representation* corresponding to the at least one declarative language function" (Emphasis added), as asserted by the Examiner on page 3, paragraph 3 of the OA. Instead, Gunderson discloses a string that can be converted into a list of structures, each structure in the list corresponding to a row in a database result table. The references to rows and columns on page 37 of Gunderson indicate that this does not teach "an intermediate tree representation..." Specifically, a tree representation is illustrated in Figs. 6-13 of the present application, relating various commands in a hierarchy, as described in paragraph 25 of the application. Therefore, Gunderson does not disclose converting the SQL to an intermediate tree representation corresponding to the at least one declarative language function," as amended in claims 1, 14, and 24.

Additionally, as amended in claims 1, 3, 14, 16, and 24, Gunderson does not disclose the limitation of JAVA statements. Support for these amendments may be found in paragraph 44 of the present application. For example, Gunderson does not disclose, "...converting the queries represented by the at least one declarative language function to a plurality of JAVA statements," as recited in amended claim 1. Gunderson is a pre-JAVA reference and does not teach, explicitly or implicitly, converting queries represented by declarative language functions to a plurality of JAVA statements.

Finally, as explained in the Interview Summary above, claims 6, 9, 19, and 29 and each of their dependent claims have been withdrawn in order to expedite a Notice of Allowance.

For at least the reasons set forth above, applicant respectfully submits that claims 1, 3-4, 14, 16-17, 24, 26, and 28 are now in allowable condition and requests a Notice of Allowance. In the event of further questions, the Examiner is urged to call the undersigned. Any additional fee which is due in connection with this amendment should be applied against our Deposit Account No. 19-0522.

Respectfully submitted,

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